SANDOZ A Novartis Division

To: Office of the Vermont Attorney General
AGO.highcostprescriptiondrugs@vermont.gov

From: Sandoz Inc.
100 College Road West
Princeton, NJ 08540

Date: July 16, 2021

Re: Vermont Act 193 (18 V.S.A. §4637)

On June 18, 2021, Sandoz Inc. ("Sandoz") notified the Office of the Vermont Attorney General ("Attorney General") of a new prescription drug, carmustine, pursuant to 18 V.S.A §4637(b).

NDC	Drug Product Description	Introduced to Market Date	WAC at Introduction
00781347432	CARMUSTINE 100MG/VL 1LYVI	6/17/2021	$1,714.30

Sandoz hereby notifies the Attorney General of the additional information required, pursuant to 18 V.S.A §4637(c).

Statutory Requirement	Reporting Information
A description of the marketing and pricing plans used in the launch of the new drug in the United States and internationally	This launch is specific to the U.S. Sandoz Inc. is contracting within the oncology and hospital space. Resources are available for hospital buyers. The WAC is priced lower than the WAC of the reference product.
The estimated volume of patients who may be prescribed the drug	Carmustine for Injection, USP is indicated as palliative therapy as a single agent or in established combination therapy in the following: Brain tumors glioblastoma, brainstem glioma, medulloblastoma, astrocytoma, ependymoma, and metastatic brain tumors. Multiple myeloma in combination with prednisone. Relapsed or refractory Hodgkin's lymphoma in combination with other approved drugs. Relapsed or refractory Non-Hodgkin's lymphomas in combination with other approved drugs. Based on 2020 Kantar Health data, the prevalence of brain tumors and multiple myeloma (the two most common indications for this product) in the U.S. is approximately 169,626 individuals.
Whether the drug was granted breakthrough therapy designation or priority review by the FDA prior to final approval	N/A
The date and price of acquisition if the drug was not developed by the manufacturer	N/A

Sandoz Inc. provides this report consistent with its understanding and interpretation of Vermont Act 193 (18 V.S.A. § 4637) and its provisions. In providing this report, Sandoz Inc.

does not waive any rights that may have at law or in equity with respect to the applicability, interpretation, or application of Vermont Act 193 (18 V.S.A. § 4637) as it may relate to Sandoz Inc. or any of its affiliates now or in the future. Sandoz Inc., on behalf of itself and affiliates, expressly reserves all such rights. We believe that all information submitted by Sandoz Inc. to the Department of Vermont Health Access or to the Attorney General under Vt. Stat. tit. 18 §§ 4635 or 4637, including all information contained in this submission, is confidential and proprietary commercial or financial information not subject to disclosure, including under the Vermont Public Records Act (Subchapter 3 of Chapter 5 of the Vermont Statutes) and applicable laws pertaining to trade secrets. We request that your company or organization maintain the confidentiality of this submission and of all Sandoz Inc.'s related information herein to the maximum extent permitted by law. To the extent that any of this designated information is requested, whether under Vermont Public Records Act (Subchapter 3 of Chapter 5 of the Vermont Statutes) or otherwise, we request that your company or organization notify us of the request and afford us the opportunity to submit objections to disclosure.

For any questions concerning this notification, please contact: state.transparency@sandoz.com.